

MORRIS PETERSON
Robert McCoy, Bar No. 9121
Email: rrm@morrislawgroup.com
Rex D. Garner, Bar No. 9401
Email: rdg@morrislawgroup.com
900 Bank of America Plaza
300 South Fourth Street
Las Vegas, Nevada 89101
Telephone: (702) 474-9400
Facsimile: (702) 474-9422

WELLS MARBLE & HURST, PLLC.
Walter D. Wilson, (*pro hac vice pending*)
Joshua P. Henry, (*pro hac vice pending*)
300 Concourse Boulevard, Suite 200
Ridgeland, MS 39157
Telephone: (601) 605-6900
Facsimile: (601) 605-6901

Attorneys for Defendant Pacific
Life Insurance Company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRIAN C. TANKO, Ltd; BRIAN
TANKO, and VICTORIA TANKO,

Plaintiffs,

v.

PACIFIC LIFE INSURANCE
COMPANY; CBZ RETIREMENT
SOLUTIONS, LLC; CORY ZIMET;
ECONOMIC CONCEPTS, INC.; ECI
PENSION SERVICES, LLC; MEDALIST
PENSION ADVISORS, LLC; PENSION
STRATEGIES, IBP, LLC, and
KENNETH R. HARSTEIN,

Defendants

CASE NO: 2:11-cv-02073-GMN-GWF

**DEFENDANT PACIFIC LIFE
INSURANCE COMPANY'S
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO
RESPOND TO COMPLAINT AND
OPPOSE MOTION TO
DISQUALIFY**

(FIRST REQUEST)

Defendant Pacific Life Insurance Company ("Pacific Life") moves the
Court for an extension of time to respond to Plaintiffs' complaint up to and
including January 16, 2012 pursuant to LR 6-1. This is the first extension
requested concerning this matter. Plaintiffs' counsel has informed Pacific Life's

1 counsel that there is no opposition to this request and that it would extend to the
2 other served defendant, Pension Strategies, IBP, LLC.

3 On November 14, 2011, Plaintiffs commenced this action by filing a
4 complaint in the Eighth Judicial District Court, Clark County, Nevada. On
5 December 22, 2011, Pacific Life removed this action to federal court and all other
6 defendants consented to the removal.

7 Pacific Life requests an extension of time because of the Christmas
8 and New Year holidays. This request is made in good faith and not made for the
9 purpose of undue delay. Therefore, Pacific Life respectfully requests that the
10 Court grant its motion.

11
12 MORRIS PETERSON

13 By: /s/ Rex D. Garner
14 Robert McCoy, Bar No. 9121
15 Rex D. Garner, Bar No. 9401
16 900 Bank of America Plaza
300 South Fourth Street
Las Vegas, Nevada 89101

17 Attorneys for Defendant
18 Pacific Life Insurance Company

19
20 **ORDER**

21 It is so ordered. Defendants Pacific Life and Pension Strategies, IBP,
22 LLC shall have up to and including January 16, 2012 to answer or otherwise
23 respond to the Complaint.

24 **DATED** this 23rd day of December, 2011.

25
26 
27 Gloria M. Navarro
United States District Judge